

**GOTTLIEB & ASSOCIATES**  
ATTORNEYS

**150 E. 18<sup>th</sup> St., Suite PHR • New York, NY 10003**  
**Tel (212) 228-9795 • Fax (212) 982-6284**  
**NYJG@aol.com**

October 7, 2021

**VIA ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 10/7/2021

Re: *Roman v. Flawless Jewelry & Timepieces Inc.*,  
Case No.: 1:21-cv-5277

Dear Judge Caproni,

The undersigned represents Juan Roman, on behalf of himself and all other persons similarly situated (“Plaintiff”) in the above referenced matter against Defendant, Flawless Jewelry & Timepieces Inc. (“Defendant”). Pursuant to Your Honor’s Individual Rule 2.C, the undersigned respectfully requests that the Initial Conference currently scheduled for October 15, 2021 at 10:00 AM (Dkt. 6) be adjourned for 30 days because the Defendant has not yet answered or appeared in this Action. In the interest of fairness to the Defendant, we would like to grant them additional time to appear so that they can properly be represented in this matter. This is the Plaintiff’s first request for an adjournment in this matter. The undersigned proposes the following dates, November 5, 2021, November 12, 2021, November 19, 2021, November 26, 2021 and December 3, 2021.

Additionally, the Complaint was filed on June 14, 2021 (Dkt. 1) and the Defendant was served June 18, 2021 (Dkt. 7), therefore the undersigned respectfully requests the deadline for the Defendant to Answer be extended until November 5, 2021 to allow the Defendant to retain counsel and appear in this matter.

Respectfully submitted,

GOTTLIEB & ASSOCIATES

/s/Michael A. LaBollita, Esq.  
Michael A. LaBollita, Esq.

Application GRANTED. The initial pretrial conference scheduled for October 15, 2021 is adjourned *sine die*.

If Defendant fails to answer or otherwise appear in this case by **October 10, 2021**, the plaintiff must move for default judgment by **October 24, 2021**.

SO ORDERED.

 10/7/2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE